1		The Honorable Barbara J. Rothstein	
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7	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE		
8	AT SE	ATTLE	
9	PAWANDEEP DHUNNA,) No.: 2:21-cv-00720-BJR	
10	Plaintiff,	STIPULATED MOTION AND ORDER TO STAY LITIGATION	
11	VS.)	
12	DEPARTMENT OF HOMELAND SECURITY, et al.,))	
13			
14	Defendants.)	
15	Plaintiff Pawandeep Dhunna and Defendants the Department of Homeland Security, et al		
16	through their respective counsel, jointly stipulate and move to continue to stay this litigation until		
17	January 24, 2023. The parties submit there is good cause to continue to stay the litigation.		
18	In this litigation, Plaintiff seeks an order compelling U.S. Citizenship and Immigration		
19	Services ("USCIS") to adjudicate his I-526 petition. USCIS issued a Request for Evidence		
20	("RFE") to Plaintiff on May 6, 2022. USCIS recently received Plaintiff's response to the RFE o		
21	October 17, 2022. To provide USCIS with the necessary time to review the response an		
22	adjudicate the I-526 petition, the parties agree that staying the litigation until January 24, 2023,		
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24			
	STIPULATED MOTION AND ORDER 2:21-cv-00720-BIR	UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5220 SEATTLE WASHINGTON 98101	

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1	appropriate. Accordingly, the parties respectfully request that this Court continue the stay and	
2	allow them to file a joint status report on or before January 24, 2023.	
3	IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.	
4	DATED: October 26, 2022	a/ Andron Iacob Hanca
5	DATED: October 26, 2022	<u>s/ Andrew Jacob Hayes</u> ANDREW JACOB HAYES WSBA #45605
6		Millar & Hayes, PC 2633 Eastlake Avenue E., Suite 300
7		Seattle, WA Phone: 206.262.0561
8		andrewh@usborderlaw.com Attorney for Plaintiff
9		Autorney for Frankfir
10		
11	DATED: October 26, 2022	NICHOLAS W. BROWN United States Attorney
12		s/ Michelle R. Lambert
13		MICHELLE R. LAMBERT, NYS#466657 Assistant United States Attorney
14		United States Attorney's Office 1201 Pacific Avenue, Suite 700
15		Tacoma, WA 98402 Phone: (253) 428-3824
16		Email: michelle.lambert@usdoj.gov Attorney for Defendants
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24	STIPULATED MOTION AND ORDER	UNITED STATES ATTORNEY 700 Stewart Street, Suite 5220

STIPULATED MOTION AND ORDER 2:21-cv-00720-BJR Page 2 UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5220 SEATTLE, WASHINGTON 98101 (206) 553-7970

ORDER IT IS SO ORDERED. Dated this 3rd day of November, 2022. Barbara & Rothstein The Honorable Barbara J. Rothstein United States District Court Judge

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